

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** :  
: **CHAPTER 7**  
**NEW YORK CITY VACATIONS, INC.** :  
: **CASE NO. 5:20-01790**  
**Debtor** :

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**TRUSTEE'S AMENDED APPLICATION TO EMPLOY SPECIAL COUNSEL  
FOR THE TRUSTEE**

Robert P. Sheils, Jr., Trustee, hereby applies for an Order authorizing the employment of David J. Harris, Esquire, as special counsel for the Trustee, and cites the following in support thereof:

1. Debtor filed their bankruptcy petition on June 10, 2020.
2. On June 10, 2020, Applicant was duly appointed as Trustee of the above-named Debtor's estate.
3. Funds have been remitted to date, and it is anticipated that there will be additional funds submitted.
4. Applicant wishes to employ David J. Harris, Esquire, as special counsel, duly admitted to practice in this Court, and makes this application pursuant to Rule 2014, Federal Rules of Bankruptcy Procedure.
5. It is necessary that the Applicant employ special counsel in connection with the administration of this bankruptcy estate for the following reasons:
  - a. To review and recommend certain bills for payment that may have been due or may become due with reference to Debtor's payroll, 401k and tax liabilities.
  - b. The perform such other legal services as may be necessary to effectuate the same.

6. Applicant reasonably believes that it is in the best interest of this bankruptcy estate, to have counsel who is extremely familiar with both the particular aspects of the Debtor's case and the general aspects of the nature of the liquidation of the assets.

7. Applicant submits that Attorney Harris is qualified to act as special counsel in connection with the administration of this bankruptcy estate.

8. Applicant states that Attorney Harris does not represent any interest adverse to the estate of the Debtor.

9. Applicant submits that it will be economical and consistent with the purposes and policies of the Bankruptcy Code that Applicant be authorized to retain Attorney Harris as special counsel herein. This retention, if authorized, will enable a cohesive, unitary administration of the bankruptcy estate. This approach will inure to the benefit of said estate and its creditors.

10. Pursuant to Rule 2014, Applicant hereby designates Attorney Harris as its special counsel for the above-referenced Chapter 7 estate with compensation arrangements at his normal hourly rates of Three Hundred Fifty Dollars per hour, plus expenses.

11. Applicant intends to apply to this Court for compensation for Attorney Harris by the filing of a Fee Application.

12. In support of this Application for Employment of David J. Harris as special counsel for the above-referenced Chapter 7 estate, Applicant files the Affidavit of David J. Harris. A copy of the Affidavit complying with the requirements set forth in Rule 2014 and Rule 5002 is attached hereto as Exhibit A.

**WHEREFORE**, your Applicant requests the entry of an appropriate Order approving the retention of David J. Harris, Esquire, as special counsel for the estate, effective as of September 4, 2020.

Dated: September 4, 2020

/s/ Jill M. Spott .  
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